

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
LUBBOCK DIVISION

UNITED STATES OF AMERICA

v.

AIDAN BRUCE-UMBAUGH

No. 5:19-CR-0130-H

**MOTION TO EXTEND DEADLINE TO PRODUCE REDACTED EXHIBITS**

The United States of America (the “Government”) files this motion to extend deadline to produce redacted exhibits as follows:

In November 2019, media outlets around the country expressed interest in obtaining copies of exhibits introduced in evidence at a detention hearing in the above-referenced case. The Court advised undersigned counsel and defense counsel of the media’s request and requested briefing from both parties concerning their position on the release of the exhibits. Defendant filed a response opposing the release of the exhibits. The government filed its response advising that it believed the exhibits should be made available to the public. On December 10, 2019, a media outlet filed a third-party response urging the court to release the exhibits for public consumption. On December 18, 2019, the Honorable D. Gordon Bryant, Jr. granted defendant’s motion to seal the exhibits until completion of Defendant’s trial or resolution of this case by an intervening plea or order of dismissal. The Court further ordered the Clerk to unseal the exhibits and provide copies to any entity submitting an appropriate request subject to the government redacting certain portions of admitted exhibits.

Specifically, the Court ordered the government to provide redacted copies of certain exhibits to the Clerk of Court containing “only the portions of the recordings played in open court” within three business days of the District Court’s acceptance of a plea resolving the case. On Wednesday, January 23, 2020, the Honorable J. Wesley Hendrix accepted Mr. Bruce-Umbaugh’s plea. Therefore, the deadline for the government to comply with the court’s order to redact certain exhibits is Monday, January 27, 2020. The Government respectfully asks this Court to extend the deadline to Monday, February 3, 2020.

Undersigned counsel is undergoing a minor surgical procedure today and is expected to return to work no sooner than Monday, January 27, 2020, barring any complications from the procedure. While the government has ordered and received the transcript from the detention hearing, undersigned counsel anticipates the redactions will take approximately 6 to 8 hours to complete. Undersigned counsel will need to review the transcript and identify the precise time stamps for each clip played during the hearing. While time stamps were generally read into the record, the time stamps are not precise and will require undersigned counsel to carefully review each clip to ensure compliance with the Court’s order. Given undersigned counsel’s pending surgical procedure and his representation that this request is not for the purpose of delay, the government respectfully requests an additional week to provide the court with the requested redactions. All other exhibits can be made available immediately.

Respectfully submitted,

ERIN NEALY COX  
UNITED STATES ATTORNEY

s/ Russell Lorfing  
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CERTIFICATE OF CONFERENCE

I certify that I conferred with Michael King, Bruce-Umbaugh's counsel, and he  
does not oppose this motion.

s/ Russell Lorfing  
RUSSELL H. LORFING  
Assistant United States Attorney

CERTIFICATE OF SERVICE

On January 23, 2020, I electronically submitted the foregoing document with the clerk of court for the U.S. District Court, Northern District of Texas, using the electronic case filing system of the court. I hereby certify that I have served all counsel and/or *pro se* parties of record electronically or by another manner authorized by Federal Rule of Criminal Procedure 49.

s/ Russell Lorfing \_\_\_\_\_  
RUSSELL H. LORFING  
Assistant United States Attorney